

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ART ASK AGENCY,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDEULE A HERETO,

Defendants.

Case No. 24-cv-2228

Judge Martha M. Pacold

MOTION FOR LEAVE TO FILE AN AMENDED SCHEDULE A

Plaintiff ART ASK AGENCY (“Plaintiff”), by and through its undersigned counsel, for its Motion for Leave to file an Amended Schedule A, states as follows:

1. On March 19, 2024, Plaintiff filed its Complaint in this case. [Dkt. No. 1].
2. Plaintiff now seeks leave to file an Amended Complaint and dismiss the following

Defendants with prejudice. Each party shall bear its own attorney’s fees and costs.

Defendant No. 50 “NEWCREATAST”

Defendant No. 53 “OMER FARUK TATLI”

Defendant No. 55 “Qinlunuho Resin Mold”

Defendant No. 69 “Suzhou Jumeijia Textile Co., Ltd.”

Defendant No. 72 “US-TANG”

Defendant No. 76 “Wanlong Spring Tree”

3. The Federal Rules of Civil Procedure provide, in relevant part, that a plaintiff may

amend its complaint with leave of Court. Federal Rule of Civil Procedure Rule 15(a)(2).

4. Courts generally grant leave to amend a pleading when justice so requires. Plaintiff submits that the filing of an Amended Schedule A to dismiss these Defendants is appropriate at this time for the matter to proceed. Plaintiff's Motion for Entry of a Preliminary Injunction is pending relative to these defendants. [Dkt. Nos. 31, 32].

WHEREFORE, Plaintiff ART ASK AGENCY moves this Honorable Court to enter an Order granting it leave to file an Amended Schedule A and dismiss these Defendants with prejudice.

DATED: May 10, 2024

Respectfully submitted,

By: s/ Michael A. Hierl
Michael A. Hierl (Bar No. 3128021)
William B. Kalbac (Bar No. 6301771)
Robert P. McMurray (Bar No. 6324332)
John Wilson (Bar No. 6341294)
Hughes Socol Piers Resnick & Dym, Ltd.
Three First National Plaza
70 W. Madison Street, Suite 4000
Chicago, Illinois 60602
(312) 580-0100

Attorneys for Plaintiff
ART ASK AGENCY

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to File an Amended Schedule A was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on May 10, 2024.

s/Michael A. Hierl